UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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SANDAWANA HOLDINGS LTD.)) 11 Civ 2712 (AKH)(RLE))
Plaintiff,)) NOTICE OF MOTION
v.) Notice of Metion
HENRY DUNAY)
Defendant.))

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the attached declarations of Peter L. Berger and Ankit Jain, the exhibits attached hereto, and upon the motion in support of Plaintiff's motion for contempt against Defendant for violation of the Court Order (D.E. 36),

That on the _____ day of ______, 2011, at _____ m., or soon thereafter as counsel may be heard, why judgment should not be issued pursuant to Fed. R. Civ. P. 70, that (1) Defendant be held in violation of the Court Order (D.E. 36), (2) that Sandawana be designated with authority to effect transfer of Defendant's internet accounts (D.E. 36), and (3) that Defendant pay Plaintiff's attorneys' fees relating to this enforcement and the previous enforcement application, and (4) other relief in the above-captioned matter.

Dated: New York, New York December 9, 2011

> Peter L. Berger (PB-0121) Jonathan Berger (JB-6448) LEVISOHN BERGER LLP 11 Broadway, Suite 615 New York, New York, 10004 (212) 486-7272